

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**  
*Pittsburgh Division*

IN RE: RONALD S. JONES	Case No. 17-22147-GLT Chapter 11
Freedom Mortgage Corporation, Movant	Hearing Date: 5/26/2022 Hearing Time: 11:00 am
vs.	
RONALD S. JONES, Debtor	
United States Trustee Respondent	

**OBJECTION TO CONFIRMATION  
OF DEBTOR'S AMENDED CHAPTER 11 PLAN OF REORGANIZATION AND  
AMENDED DISCLOSURE STATEMENT**

Freedom Mortgage Corporation ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Amended Chapter 11 Plan of Reorganization and Amended Disclosure Statement* (Doc 205), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 11 of the Bankruptcy Code on May 22, 2017.
2. Movant holds a security interest in the Debtor's real property located at 3307 Waterford Dr, Pittsburgh, PA 15238 (the "Property"), by virtue of a Mortgage which is recorded

as instrument Number 2016-35264 in Official Records of Allegheny County, Pennsylvania. Said Mortgage secures a Note in the amount of \$275,793.00.

3. The Debtor filed an Amended Chapter 11 Plan of Reorganization (the “Plan”) and Amended Disclosure statement on April 4, 2022 (Doc 205 and 207).

4. Movant objects to Debtor’s proposed Chapter 11 Plan as Part 3.2 states that “Confirmation of this plan constitutes and adjudication the mortgage is current”.

5. Although Movant has not yet filed its proof of claim, it is anticipated that the claim will show the pre-petition arrearage due to Movant is \$7,259.09 Therefore, the Movant objects to Debtor’s proposed Chapter 11 Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.

6. Movant objects to any plan which proposes to pay it anything less than \$7,259.09 as the pre-petition arrearage over the life of the plan.

**WHEREFORE**, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/ Mario Hanyon  
Mario Hanyon  
(Bar No. 203993)  
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**CERTIFICATE OF SERVICE OF OBJECTION TO CONFIRMATION OF DEBTOR'S  
AMENDED CHAPTER 11 PLAN**

I certify under penalty of perjury that on this day, I served or caused to be served the OBJECTION TO CONFIRMATION OF DEBTOR'S AMENDED CHAPTER 11 PLAN on the parties at the addresses shown below or on the attached list.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was:

Via CM/ECF electronic notice:

Donald R. Calaiaro, Esq.  
*Counsel for Debtor*

Office of the United States Trustee

Via First Class Mail:

RONALD S. JONES  
3307 WATERFORD DRIVE  
PITTSBURGH, PA 15238  
*Debtor*

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, names and addresses of parties served by electronic notice will be listed under the heading "Via CM/ECF electronic notice" and those served by mail will be listed under the heading "Via First Class Mail".

EXECUTED ON: May 2, 2022

/s/ Mario Hanyon  
Mario Hanyon  
(Bar No. 203993)  
Attorney for Creditor  
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302 Fellowship Road, Ste 130  
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**PAWB Local Form 7 (07/13)**

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IN RE:

RONALD S. JONES

Freedom Mortgage Corporation,  
Movant

vs.

RONALD S. JONES,  
Debtor

United States Trustee  
Respondent

Case No. 17-22147-GLT  
Chapter 11

Hearing Date: 5/26/2022

Hearing Time: 11:00 am

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2022, upon consideration of Freedom Mortgage Corporation's Objection to Confirmation of Debtor's Chapter 11 Plan and any response thereto (if any), it is:

**ORDERED AND DECREED:** that Confirmation of Debtor's Chapter 11 Plan is denied.

\_\_\_\_\_  
Honorable Gregory L. Taddonio  
United States Bankruptcy Court Judge